

EXHIBIT 8

Jacquelyn Callanen

April 20, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,)	
ET AL)	
vs.)	CASE NO. 5:21-CV-844-XR
GREGORY W. ABBOTT, ET AL)	
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OCA-GREATER HOUSTON, ET AL)	
vs.)	CASE NO. 1:23-CV-780-XR
JOHN SCOTT, ET AL)	
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HOUSTON JUSTICE, ET AL)	
vs.)	CASE NO. 5:21-CV-848-XR
GREGORY WAYNE ABBOTT, ET AL)	
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LULAC TEXAS, ET AL)	
vs.)	CASE NO. 1:21-CV-0786-XR
JOHN SCOTT, ET AL)	
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MIFAMILIA VOTA, ET AL)	
vs.)	CASE NO. 5:21-CV-0920-XR
GREG ABBOTT, ET AL)	
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UNITED STATES OF AMERICA)	
vs.)	CASE NO. 5:21-CV-1085-XR
THE STATE OF TEXAS, ET AL)	

ORAL VIDEOTAPED DEPOSITION

JACQUELYN CALLANEN

APRIL 20, 2022

1 correct?

2 A. Correct.

3 Q. And then, of course, now there is this new part
4 about the penalty of perjury which we know is criminal
5 prosecution.

6 A. Yes.

7 Q. How would you advise a possible assistor to
8 obtain a statement of eligibility for assistants from
9 the voter?

10 MS. HUNKER: Objection, form.

11 THE WITNESS: Again, that we don't enter
12 into that. That is not part of our instructions.

13 Q. (By Ms. Perales) So if someone called your
14 office and said you, elections department, you are in
15 charge of elections, I want to assist my neighbor, how
16 do I obtain a statement of eligibility for assistance?
17 How would you advise them?

18 A. Again, we would not do that. We would not.
19 There are certain lines we don't cross. Because a lot
20 in the past when we have tried to be of assistance, it
21 will turn around and bite us. I'm sorry. That is not
22 real PC but we have trained the staff not to anything
23 that can be interpreted like that. It is up to that
24 person.

25 Q. Would you agree with me that some voters would

1 be reluctant to share details about a need for
2 assistance such as the type of disability?

3 MS. HUNKER: Objection, form.

4 THE WITNESS: Sure.

5 Q. (By Ms. Perales) Do you think -- would you
6 agree with me that some possible assistors might feel
7 reluctant to want to probe the voter for a statement of
8 eligibility?

9 MS. HUNKER: Objection, form.

10 THE WITNESS: I would hope not. But
11 again, we are not involved in that piece.

12 Q. (By Ms. Perales) A moment ago, we talked about
13 assistors helping voters understand how to use the
14 voting machine. How would you advise someone who called
15 your office and said that they want to serve as an
16 assistor but the oath says they have to confine their
17 assistants to either reading the ballot or marking the
18 ballot?

19 MS. HUNKER: Objection, form.

20 THE WITNESS: Not on how to use the
21 equipment. Is that what you are asking?

22 Q. (By Ms. Perales) Yes.

23 A. Again, we would direct them to our web site
24 where we have videos on how to use the equipment and
25 basic, you know, voter ID, the information there that

1 they would need.

2 Q. Is that information available, for example, in
3 Asian languages?

4 A. Again, English and Spanish only.

5 Q. How would you advise someone who called your
6 office and said they wanted to provide voter assistance
7 but they are not sure what it means to pressure a voter?
8 Let's say an assistor calls you and says well, I have
9 reminded my neighbor to vote three times. Am I
10 pressuring her if I take her to the polls and help her
11 get around inside of the polling place?

12 MS. HUNKER: Objection, form.

13 Q. (By Ms. Perales) How would you advise that
14 potential assistor?

15 MS. HUNKER: Same objection.

16 THE WITNESS: Again, we wouldn't enter
17 into that.

18 Q. (By Ms. Perales) Would you sign an oath under
19 penalty of perjury if you weren't sure you were
20 complying with the oath?

21 MS. HUNKER: Objection, form.

22 Q. (By Ms. Perales) Personally?

23 A. Personally, no.

24 Q. Have you received any guidance or training from
25 the secretary of state about the requirement that an

1 you taking the time leading up to the election.
2 However, with that said, I have no further questions so
3 I thank you again.

4 THE WITNESS: Thank you. Bless you.
5 Thank you. I appreciate it.

6 VIDEOGRAPHER: The time is 7:07 p.m. We
7 are off the record.

8 (Proceedings concluded at 7:07 p.m.)

9 (Pursuant to FCRP 30(e)(1), request to review the
10 transcript was not made by either deponent or party
before the deposition was completed.)

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